
EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

THE TRUSTEES OF PURDUE UNIVERSITY,

Plaintiff,

vs.

STMICROELECTRONICS N.V., ET AL,

Defendants.

6:21–CV–727-ADA

JURY TRIAL DEMANDED

DEFENDANTS' IDENTIFICATION OF EXTRINSIC EVIDENCE FOR CLAIM CONSTRUCTION

In accordance with the Court's Scheduling Order [ECF 45], Defendants STMicronics, Inc. and STMicronics N.V.¹ (referred to collectively herein as "the ST Defendants") identify the following items of extrinsic evidence that they may cite or rely upon in their claim-construction briefing. Relevant excerpts from the identified items are being served with this disclosure.

1. James A. Cooper, Michael R. Melloch, Ranbir Singh, Anant Agarwal & John W. Palmour, "Status and Prospects for SiC Power MOSFETs," in IEEE Transactions on Electron Devices, Vol. 49, No. 4, pp. 658–64 (Apr. 2002);
2. Sei-Hyung Ryu, Anant K. Agarwal, Nelson S. Saks, Mrinal K. Das, Lori A. Lipkin, Ranbir Singh & John W. Palmour, "Design and Process Issues for Silicon Carbide Power DiMOSFETS," in Mat. Res. Soc. Symp. Vol. 640, pp. H4.5.1 – H.4.5.6 (2001);
3. Jayarama N. Shenoy, James A. Cooper, Jr. & Michael R. Melloch, "High-Voltage Double-Implanted Power MOSFET's in 6H-SiC," in IEEE Electron Device Letters, Vol. 18, No. 3, pp. 93–95 (Mar. 1997);
4. U.S. Patent No. 6,956,238 (issued Oct. 18, 2005);
5. B. Jayant Baliga, Modern Power Devices (1987);

¹ STMicronics N.V. is not subject to the Court's jurisdiction, as detailed in its Motion to Dismiss [ECF 38]. And STMicronics International N.V. has not yet been served in this case and therefore is not properly before the Court and not subject to the Court's jurisdiction.

6. Dethard Peters, Reinhold Schörner, Peter Friedrichs & Dietrich Stephani, “4H-SiC Power MOSFET Blocking 1200V with a Gate Technology Compatible with Industrial Applications,” in Materials Science Forum Vols. 433-436, pp. 769–72 (2003);
7. Michael Quirk & Julian Serda, Semiconductor Manufacturing Technology (2001).
8. U.S. Patent No. 7,622,741 (issued Nov. 24, 2009);
9. U.S. Patent No. 7,645,658 (issued Jan. 12, 2010);
10. U.S. Patent No. 8,133,787 (issued Mar. 13, 2012);
11. A. S. Grove, Physics and Technology of Semiconductor Devices (1967);
12. Y. Song, S. Dhar, L. C. Feldman, et al., “Modified Deal Grove Model for the Thermal Oxidation of Silicon Carbide,” in Journal of Applied Physics, Vol. 95, No. 9, pp. 4953–57 (May 1, 2004);
13. S. P. Murarka, M. Eizenberg & A. K. Sinha, Interlayer Dielectrics for Semiconductor Technologies (2003);
14. S. M. Sze, Physics of Semiconductor Devices (2d Ed. 1981); and
15. Expected testimony of Dr. Vivek Subramanian. Such testimony may concern the state of the art, the education and experience levels of a person of ordinary skill in the art with respect to each asserted patent, ordinary meanings of claim terms, and what one of ordinary skill in the art would understand claim terms to mean in view of the intrinsic and/or extrinsic evidence. Such testimony may also include an opinion that a person of ordinary skill in the art would find claim terms indefinite, because when viewed in light of the specification and prosecution history, they fail to inform, with reasonable certainty, those skilled in the art about the scope of the claimed invention. The ST Defendants additionally reserve the right to rely on expert testimony to respond to any expert testimony advanced by Plaintiff.

Dated: February 7, 2022

Respectfully submitted:

By: /s/ Justin S. Cohen

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CERTIFICATE OF SERVICE

I certify that on February 7, 2022, the foregoing document was served via electronic mail on counsel of record for Plaintiff.

/s/ Justin S. Cohen
Justin S. Cohen